

---

---

IN THE  
SUPREME COURT OF MARYLAND

---

No. 11  
SEPTEMBER TERM, 2025  
SCM-REG-0011-2025

---

MAYOR & CITY COUNCIL OF BALTIMORE V. B.P. P.L.C., ET AL.,

V.

B.P. P.L.C., ET AL., CITY OF ANNAPOLIS.

---

APPEAL FROM THE CIRCUIT COURT FOR BALTIMORE CITY  
HONORABLE VIDETTA BROWN, JUDGE

---

CITY OF ANNAPOLIS COUNTY,

V.

B.P. P.L.C. ET AL.

---

APPEAL FROM THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY  
HONORABLE STEVEN PLATT, SENIOR JUDGE

---

**CONSENT MOTION REQUESTING PERMISSION TO FILE AN AMICI CURIAE BRIEF  
BY PROFESSOR RICHARD A. EPSTEIN, PROFESSOR JOHN YOO, AND  
MOUNTAIN STATES LEGAL FOUNDATION**

Joseph Henchman (#0712110344)  
415 W Street NE #A  
Washington, DC 20002  
joebishophenchman@gmail.com

Richard A. Epstein  
16 Thomas Place  
Norwalk, CT 06853-1500

Ivan L. London  
Mountain States Legal Foundation  
2596 South Lewis Way  
Lakewood, Colorado 80227  
(303) 292-2021  
ilondon@mslegal.org  
(*special admission pending*)

John Yoo  
1550 Tiburon Blvd  
#G503  
Tiburon, CA 94920  
(510) 600-3217

*Attorneys for Amici Curiae*

July 15, 2025

---

---

## CONSENT MOTION

NOW COME proposed amici curiae Professor Richard A. Epstein, Professor John Yoo, and Mountain States Legal Foundation, by and through their undersigned counsel, and per Maryland Rule 8-511, hereby move for leave to file the amicus brief appended to this motion as Exhibit A. Each party has consented to the filing of amicus briefs in this appeal and has waived service of hard copies.

Respectfully submitted,

/s/ Joseph Henchman

Joseph Henchman  
(Attorney ID #0712110344)  
415 W Street NE #A  
Washington, DC 20002  
(202) 766-5019  
joebishophenchman@gmail.com

Ivan L. London  
Mountain States Legal Foundation  
2596 South Lewis Way  
Lakewood, Colorado 80227  
(303) 292-2021  
ilondon@mslegal.org  
(special admission pending)  
*Attorneys for Amici Curiae*

### **CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing to be served on this 15th day of July 2025 to all counsel of record associated with this case via the MDEC system.

/s/ Joseph Henschman  
Joseph Henschman (#0712110344)